

MEMO ENDORSED

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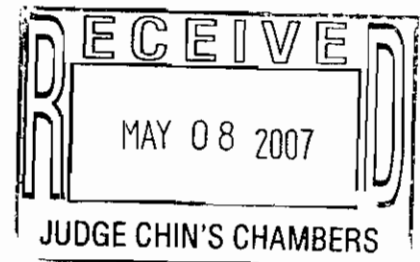
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May 7, 2007

VIA HAND DELIVERY

Honorable Denny Chin
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007



Re: Balli Klockner v. JSW Steel
07 Civ. 3590 (DC)
Our File No. 4722-001

Dear Judge Chin:

We represent Petitioner, Balli Klockner GmbH, and write to request a pre-motion conference in connection with an anticipated motion for an order confirming a foreign arbitral award and directing entry of judgment in favor of Petitioner.

This proceeding involves a Petition For An Order Confirming A Foreign Arbitral Award ("Petition") (a courtesy copy of the Petition is enclosed for ease of reference) and is governed by the provisions of the Convention on the Recognition and Enforcement of Foreign Arbitral Awards, 21 U.S.T. 2517, T.I.A.S. No. 6997, 330 U.N.T.S. 3 ("Convention") and the Federal Arbitration Act, 9 U.S.C. § 1 et seq. ("FAA"). The FAA provides as follows:

Within three years after an arbitral award falling under the Convention is made, any party to the arbitration may apply to any court having jurisdiction under this chapter for an order confirming the award as against any other party to the arbitration. The court shall confirm the award unless it finds one of the

-2-

grounds for refusal or deferral of recognition or enforcement of the award specified in the said Convention.

9 U.S.C. § 207

The FAA also provides as follows:

Any application to the court hereunder shall be made and heard in the manner provided by law for the making and hearing of motions, except as otherwise herein expressly provided.

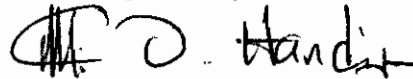
9 U.S.C. § 6

The purpose of Section 6 is to "expedite judicial treatment of matters pertaining to arbitration." World Brilliance Corporation v. Bethlehem Steel Company, 342 F.2d 362, 365-366 (2d Cir. 1965).

The foreign arbitral award is dated September 4, 2006, and Petitioner and Respondent were parties to the Swedish arbitration proceedings. Petitioner seeks an order confirming the foreign arbitral award. Such an application, under the pertinent provisions of the FAA, should be heard by way of a motion.

Petitioner, in view of the foregoing, requests that the court schedule a pre-motion conference or permit Petitioner to make the anticipated motion for an order confirming the foreign arbitral award and directing the entry of judgment in favor of Petitioner.

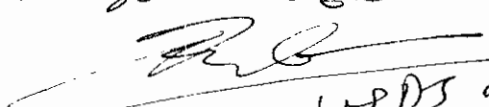
Respectfully submitted,



Michael O. Hardison

VIA FEDERAL EXPRESS

Mr. Sajjan Jindal
JSW Steel Ltd.
5A Dr. G. Deshmukh Marg
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Petitioner may move to
confirm without a pre-motion
conference. Petitioner shall move
by 6/8/07; respondent shall
oppose by 7/6/07; reply papers
by 7/16/07. so ORDERED.

WDS 5/15/07